

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

RAYMOND G. BURKE, WILLIAM  
H. BURKE, GEORGE B. ROSICA,  
PRESSAC HOLDINGS, PLC, a company  
organized in the United Kingdom,  
KAUMAGRAPH FLINT CORPORATION,  
a Michigan Corporation,

Plaintiffs,

Cause No.

vs. Hon.

THOMAS A. CETOLA, an individual and  
G. RICHARD HOBART, an individual,

Defendants.

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PEPPER HAMILTON, LLP T. H. KEATING & ASSOCIATES, PLLC  
Matthew J. Lund (P48632) Thomas H. Keating (P34411)  
Co-Counsel for Plaintiffs Attorney for Plaintiffs  
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JOSEPH E. MOORE (P06240)  
Attorney for Defendants  
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**STIPULATION AND ORDER FOR  
JUDGMENT**

**DECLARATORY JUDGMENT**

At a session of said Court, held in the City of Detroit,  
County of Wayne, State of Michigan,  
on APRIL 26, 2006.

PRESENT: PATRICK J. DUGGAN  
U.S. DISTRICT COURT JUDGE

UPON THE STIPULATION OF THE PARTIES AS SET FORTH BELOW,  
IT IS HEREBY ORDERED AND ADJUDGED:

- A. That Defendants THOMAS A CETOLA and G. RICHARD HOBART are deemed to have no claims or rights of any kind, including, without limitation, all past, present or future claims for benefits related to their prior relationship with KAUMAGRAPH FLINT CORPORATION (under any insurance coverage policy or otherwise), against Plaintiffs RAYMOND G. BURKE, WILLIAM H. BURKE, GEORGE B. ROSCIA, PRESSAC HOLDINGS, PLC and KAUMAGRAPH FLINT CORPORATION, and their representatives, stockholders, controlling persons, affiliates or other related entities, and that THOMAS A. CETOLA and G. RICHARD HOBART are deemed estopped and otherwise precluded from making any such claims.
- B. That Escrow Agent MORGAN STANLEY is, upon service of this Judgment ordered to release the escrowed funds in its possession held pursuant to the escrow agreement of April 27, 1997 to PRESSAC HOLDINGS, PLC, KAUMAGRAPH FLINT CORPORATION, RAYMOND G. BURKE, WILLIAM H. BURKE and GEORGE B. ROSICA in such amounts as those parties agree in writing.

C. This Judgment is entered without costs, interest or attorney fees against any party.

s/PATRICK J. DUGGAN  
U.S. District Court Judge

**STIPULATION**

We stipulate to the entry of the above Declaratory Judgment:

s/ Matthew J. Lund                      s/ Thomas H. Keating  
Matthew J. Lund (P48632) Thomas H. Keating (P34411)  
Pepper Hamilton LLP              Attorney for Plaintiffs  
Co-Counsel for Plaintiffs      24055 Jefferson Avenue, Ste. 101  
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s/ Joseph E. Moore  
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